

Civil Action No.:
2:09-cv-UNAS-00709-HGD

ORAL ARGUMENT
REQUESTED

**PLAINTIFF’S RESPONSE TO DEFENDANT FRANKLIN COLLECTION
SERVICE, INC.’S MOTION TO DISMISS PLAINTIFF’S AMENDED
COMPLAINT AND ALL CLAIMS WITH PREJUDICE**

COMES NOW the Plaintiff, by and through counsel, in the above styled cause, and responds to Defendant Franklin Collection Service, Inc.'s Motion to Dismiss Plaintiff's Amended Complaint and All Claims with Prejudice (Doc 12, filed on August 21, 2009) as follows:

1. Plaintiff adopts and incorporates all previous arguments stated in the Response in Opposition to Franklin Collection Services, Inc.'s Motion to Dismiss (Doc 9) filed on May 26, 2009.
2. Plaintiff respectfully requests the opportunity to present oral argument on the Defendant's Motion to Dismiss.

Respectfully Submitted,

/s/ John G. Watts

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CERTIFICATE OF SERVICE

This is to certify that on the **22nd** day of **August, 2009**, I electronically filed a true and correct copy of the above and foregoing document via the CM/ECF system which will notify all counsel of record.

/s/ John G. Watts
OF COUNSEL